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TRUDI G. MANFREDO, Bar No. 166474
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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In the Matter of)	Case No. 11-18566-A-7
)	Chapter 7
)	TMT-2
HOWARD PETERSEN and SHARON)	
PETERSEN,)	Date: October 19, 2011
)	Time: 9:00 a.m.
)	Dept: A, Courtroom 11,
Debtors.)	Fresno
)	The Honorable Whitney Rimel

TRUSTEE'S MOTION FOR AUTHORITY TO SELL
PERSONAL PROPERTY AT PUBLIC AUCTION

The Motion for Order Authorizing Trustee to Sell Personal
Property at Public Auction filed by Trudi G. Manfredo, Chapter 7
Trustee, represents:

1. Trudi G. Manfredo ("Trustee"), is the duly appointed,
qualified and acting trustee in the Chapter 7 case filed by Howard
Petersen and Sharon Petersen ("Debtors"). Debtors filed for
relief under Chapter 7 of the Bankruptcy Code on July 28, 2011.

2. This is a core matter under 28 U.S.C. § 157 (b) (2) (A)
and (N).

1 3. One of the assets of this estate is a 2008 Keystone
2 Cougar 5th Wheel Travel Trailer, VIN 4YDF278218C501280. This
3 trailer is subject to an encumbrance of approximately \$9,000.00 in
4 favor of Bank of the West, which will be paid from the auction
5 proceeds, and debtor's have not claimed an exemption in the
6 trailer.

7 4. Trustee believes the vehicle will sell for \$15,000.00.

8 5. Trustee has secured this Personal Property by arranging
9 for her auctioneer to move the Personal Property to the auction
10 site, 1731 Art Street, Bakersfield, California.

11 6. The Trustee believes that selling the Personal Property
12 at public auction will yield the best price obtainable under the
13 circumstances of the Chapter 7 case filed by Debtor. This
14 personal property is not the only asset of the estate.

15 7. The Trustee believes that the sale of Personal Property
16 at public auction is in the best interests of the estate and its
17 creditors because a sale by public auction would be the most
18 efficient and economical way to sell the Personal Property in the
19 least amount of time.

20 8. In order to expedite the sale of the Personal Property,
21 the Trustee entered into an agreement with Jerry Gould of Gould
22 Auction and Appraisal Company, to advertise and manage the auction
23 ("Auctioneer"). According to the agreement between the Trustee
24 and Auctioneer, the fees for professional services rendered by
25 Auctioneer will not exceed 15% (fifteen percent) on the gross
26 proceeds of the auction plus \$350.00 in extraordinary expenses for
27 transporting the vehicle and for necessary repairs. Auctioneer
28 will also charge the buyer \$50.00 to cover costs incurred for

1 transferring title with the DMV.

2 9. The details of the compensation to the Auctioneer will
3 be subject to the terms and conditions set forth in the
4 Application for Order Authorizing Employment of Auctioneer to
5 Conduct Public Auction which is being filed concurrently
6 herewith.

7 10. The public auction is currently scheduled for October
8 22, 2011, at 9:00 a.m. with the auction to be held at 1731 Art
9 St., Bakersfield, California 93312.

10 WHEREFORE, Trustee prays as follows:

11 1. That Trustee's Motion for authority to Sell Personal
12 Property at Public Auction be granted;

13 2. That the Trustee be authorized to sell the Personal
14 Property at public auction on or about October 22, 2011, at 9:00
15 a.m. with the auction to be held at 1731 Art St. Bakersfield,
16 California, 93312;

17 3. That the Trustee be authorized to pay 15% commission to
18 Gould Auction from the proceeds received from the auction sale.
19 Auctioneer is also authorized to charge the buyer \$50.00 to cover
20 costs incurred for transferring title with DMV. Auctioneer will
21 not be reimbursed for any extraordinary expenses in excess of
22 \$350.00 without further court order;

23 4. For such other and further relief as the Court deems to
24 be just and proper.

25 Dated: September 19, 2011

/s/ Trudi G. Manfredo
TRUDI G. MANFREDO, Trustee

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